

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

**ADobe SYSTEM INCORPORATED'S MOTION FOR RECONSIDERATION OF THE
PRIOR SUMMARY JUDGMENT RULING REGARDING PATENT ELIGIBILITY IN
LIGHT OF POTENTIAL CHANGES IN CONTROLLING LAW AND IN LIGHT OF
THE COURT'S SUBSEQUENT RULING ON CLAIM CONSTRUCTION**

Defendant Adobe Systems Incorporated (“Adobe”) respectfully moves the Court that in light of recent precedential developments at the Federal Circuit and claim construction rulings in this case, the Court reconsider its Memorandum Opinion (Dkt. No. 879) and Order (Dkt. No. 880) denying Adobe’s Motion for Summary Judgment that the Asserted Claims of the DCOM Patents are Invalid under 35 U.S.C. § 101. The grounds and authority in support of this motion are set forth in the accompanying Brief in Support of Adobe’s Motion for Reconsideration of the Prior Summary Judgment Ruling Regarding Patent Eligibility in Light of Potential Changes in Controlling Law and In Light of the Court’s Subsequent Ruling on Claim Construction, the Declaration of Roman Lifson in Support of Adobe’s Motion for Reconsideration and the exhibits attached thereto, the pleadings and materials on file in this case, and upon any pleadings that may be filed or argument of counsel that may be heard by the Court. Adobe made a good-faith attempt to meet and confer to narrow the issues presented in this motion pursuant to Local Civil Rule 7(E).

Dated: April 20, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of April, 2018 a true and correct copy of the foregoing was served using the Court's CM/ECF system, with electronic notification of such filing to all counsel of record.

/s/

Roman Lifson

*Counsel for Defendant and Counter-Claimant
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